UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

PELE SMITH,	)	CASE NO.: 1:16-CV-02248
	)	
Plaintiff,	)	JUDGE: CHRISTOPHER A. BOYKO
	)	
vs.	)	**JOINT MOTION TO STAY**
	)	**PROCEEDINGS**
CITY OF LORAIN, et al.,	)	
	)	
Defendants	)	
	)	

Now comes Counsel for Plaintiff Pele Smith, Mark Petroff , and Counsel for Defendants, Todd Raskin and Patricia Rubright of Mazanec, Raskin and Ryder, and jointly respectfully request the court stay the remaining proceedings in this case. The parties have engaged in written discovery but are not in a position to conduct depositions of the parties. This request is not interposed for delay but rather to accomplish a fair outcome for both Plaintiff and Defendants.

At this time, Plaintiff Smith is presently incarcerated which interferes with the ability to consult with him and furnish him for deposition in the near future. In addition, due to the status of other proceedings, Defendant officers are unable to be meaningfully deposed at this time.

Given the situation of the parties, Plaintiff and Defendants respectfully request the court stay any further proceedings.

Respectfully submitted,

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Counsel for Defendants City of Lorain, Cel Rivera, Zachary Ferenec, Timothy Thompson, Michael Gidich and Miguel Salgado

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2017, a copy of the foregoing Joint Motion to Stay Proceedings was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Patricia A. Rubright
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Counsel for Defendants City of Lorain, Cel Rivera, Zachary Ferenec, Timothy Thompson, Michael Gidich and Miguel Salgado

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